

# Georgia Department of Natural Resources

## Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

April 23, 2015

**COPY**

Indian Trail Association, LTD  
c/o Mr. Craig Harper  
P.O. Box 767127  
Roswell, Georgia 30076

Re: Semi-Annual Voluntary Remediation Program Progress Report (3), May 27, 2014  
Semi-Annual Voluntary Remediation Program Progress Report (4), February 4, 2015  
Professional Cleaners & Linen Service  
2040 Beaver Ruin Road  
Norcross, Gwinnett County, Georgia  
Tax Parcel ID 6212 036

Dear Mr. Harper:

The Georgia Environmental Protection Division (EPD) has reviewed the 3<sup>rd</sup> and 4<sup>th</sup> Semi-Annual Voluntary Remediation Program (VRP) Progress Reports submitted by Environmental Management Associates, LLC (EMA) pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD has the following comments:

### **Progress Report 3**

1. The delineation standard for tetrachloroethene (PCE) is 5 µg/L. Delineation must be completed in the areas of MW-5 and MW-10 if detections exceeding this concentration occur again in the future.
2. The proposed well location to the east of MW-4 is approved and should be included in future monitoring reports. Please provide EPD with the boring log and a well construction log that details the method of borehole advancement, borehole diameter, well depth, screen length, screen slot size, well construction material, length of filter pack, method of filter pack emplacement, method used to seal the well from surface seepage along the casing, and method used to develop the well.
3. Section 2.1 of the report states that a peristaltic pump was used for purging and sampling of the wells. This pump is suitable for the shallow wells, but it would not work for MW-2D, which is approximately 75' deep. The field data sheet says the pump intake was placed at 72' (which is correct for low flow purging based on the screened interval reported for the well), but the limit of the peristaltic pump is about 30' depending on water level and screen interval. Please clarify whether a peristaltic pump was used at this location, and provide further details of any deviations from protocol used at other sampling locations.
4. PCE detections in groundwater at MW-1, MW-4, and MW-11 exceeded HSRA Type 4 groundwater Risk Reduction Standards during this sampling event.

### **Progress Report 4**

5. PCE is the only contaminant currently being investigated. Degradation products, such as trichloroethylene, dichloroethylene, and vinyl chloride, should also be included in analytical

procedures to monitor exposure risk. In the next monitoring event, please include all relevant PCE degradation products.

6. The well proposed in the 3<sup>rd</sup> Progress Report (MW-12) has not yet been installed or sampled. Please include sampling results from this well in future reports, or include written justification for its omission.
7. The report requests a "No Further Action Required" status for the site. While none of the wells contained PCE higher than the Type 1 RRS in this sampling event, EPD is requiring the continuation of regularly scheduled semiannual sampling events to ensure that rebound does not occur, as it has in the past.

### General Comments

8. The reports state that the low-flow/low-stress purging method was used when collecting samples. Future investigations should employ the Traditional Multiple Volume Purge method to ensure that sample results are representative of site conditions. The total well volume, rather than well screen volume, should be recorded in future sampling events. Please follow the SESD standard operating procedures (SOPs) document titled *Groundwater Sampling* (SESDPROC-301-R3, effective March 6, 2013). Justification must be provided in writing if deviations from these documents are necessary. These documents are available at the following website:

<http://www.epa.gov/region04/sesd/fbqstp/>

9. The groundwater sampling forms provided in the appendices are incomplete. Calculations for the well volume should be shown and purge volumes should be documented.
10. A release notification has been submitted to EPD for a site directly downgradient of the Professional Cleaners site. According to the notification, PCE was detected at a concentration of 60 µg/L at the former Autosmith Used Car facility (currently Flamingo Auto Sales, 1996 Indian Trail Road). Since there has been no known historic use of PCE at this location and Professional Cleaners is the suspected source of contamination, additional groundwater wells should be installed at 1996 Indian Trail Road to confirm the presence of PCE. The wells should be located in close proximity to where the samples were previously taken, as indicated on the attached sample map. Please coordinate this sampling event with the current owners and include the results in the next monitoring report.

Indian Trail Association, LTD must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Indian Trail Association, LTD. However, failure of EPD to respond to a submittal within any timeframe does not relieve Indian Trail Association, LTD from complying with the provisions, purposes, standards and policies of the Act.

Mr. Harper  
Indian Trail Association, LTD  
April 23, 2015  
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If you have any questions, please contact Jonathan Callura at (404) 232-1502.

Sincerely,

A handwritten signature in black ink, appearing to read "David Reuland". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "Reuland".

David Reuland  
Unit Coordinator  
Response and Remediation Program

✓CC: Brent Cortelloni, EMA

File: VRP 1314972618 – Professional Cleaners & Linen Service

**Attachment:** 1996 Indian Trail Road Sample Locations

